

HON. RICHARD A. JONES

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

PHILIP SMITH,

Plaintiff,

vs.

COUPANG, INC.,

Defendant.

Case No. 2:23-cv-01887-RAJ

**DECLARATION OF ALICIA COBB IN  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE  
CORRECTED AMENDED COMPLAINT**

I, Alicia Cobb, hereby state as follows:

1. I am a Partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Coupang, Inc. in the above-captioned action. I submit this declaration in opposition to Plaintiff's Motion for Leave to File Corrected Amended Complaint. I have personal knowledge of the matters stated in this declaration based upon my involvement in this case and a review of the file.

2. On March 5, 2024, Defendant's counsel requested Plaintiff's availability for a meet and confer regarding Defendant's upcoming Motion to Dismiss Plaintiff's Amended Complaint. Plaintiff's counsel stated that they were available the afternoon of March 8, 2024.

3. On March 8, 2024, counsel for Plaintiff and Defendant, including myself, Randa Osman, Ryan Swindall, Michael Subit, Cassandra Lenning, and Kendall Onyendu, met and conferred over Zoom regarding Defendant's grounds for its upcoming Motion to Dismiss Plaintiff's Amended Complaint. During that meet and confer, among other discussions,

1 Defendant's counsel explained that Plaintiff's Amended Complaint incorrectly identified  
2 Plaintiff's employer as Coupang Global, LLC, rather than Coupang, LLC, and incorrectly  
3 identified Defendant's predecessor entity as Coupang Global, LLC, rather than Coupang, LLC.  
4 Plaintiff's counsel did not state that they were unaware of these facts, or indicate any intention of  
5 correcting its Amended Complaint. Defendant then filed its Motion to Dismiss the Amended  
6 Complaint on March 11, 2024.

7 4. On March 22, 2024, Plaintiff's counsel emailed Defendant's counsel to inform  
8 Defendant's counsel for the first time that Plaintiff's counsel wished to revise the Amended  
9 Complaint to correct those inaccuracies.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this 15th day of April, 2024, at Boston, Massachusetts.

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14 /s/ Alicia Cobb  
15 Alicia Cobb  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on April 15, 2024, I caused a true and correct copy of the foregoing to be filed in this Court's CM/ECF system, which sent notification of such filing to counsel of record.

DATED April 15, 2024.

/s/ Alicia Cobb  
Alicia Cobb, WSBA #48685